



May 4, 2011

Mr. James Herink, Staff Counsel
Office of Chief Counsel
State Water Resources Control Board
1001 I Street, 22nd Floor
Sacramento, CA 95814

Subject: SWRCB/OCC Files A-2144(a) and A-2144(b) (Consolidated)

Dear Mr. Herink:

On behalf of the Coalition for a Sustainable Delta, I urge the State Water Resources Control Board to affirm the more stringent permit conditions issued by the Central Valley Regional Water Quality Control Board in December 2010 for the Sacramento Regional County Sanitation District's (SRCSD) wastewater treatment plant. The permit contains critical measures that will require SRCSD to implement much needed treatment plant upgrade.

As you know, the SRCSD is the largest discharger of wastewater into the Delta. It is also one of the few remaining dischargers in the region that has yet to upgrade to advanced treatment technologies. This is not just a Sacramento issue. This permit is critical to the health of the Delta ecosystem. This permit is also a vital issue for the entire state. Water supplies moved across the Delta are used by more than 25 million Californians.

Maintaining a high-quality source supply is fundamental for sound water management. Many organizations and state and federal agencies have voiced concerns regarding SRCSD's current practices. Last year, the California Department of Public Health expressed to the Central Valley Regional Water Quality Control Board its well-reasoned concerns about the untreated pathogens that are presently contained in the discharge from this facility. Removing pathogens from this wastewater stream is a basic requirement for human health protection, both for recreational purposes in the Delta as well as for downstream drinking water uses. Downstream drinking water treatment plants rely on multiple barriers to ensure public health protection. Controlling sources of contamination is the first barrier.

The approved permit correctly acknowledges the growing list of emerging science showing that ammonia and other pollutants have significantly altered the Delta's food web – contributing to the overall decline of the estuary's health. For the last few decades, the state and federal water project operations have been the focus of regulatory agencies in an attempt to revive fish populations. It's now clear that the only way to make long-term improvements is to address all the factors that impact

the Delta ecosystem – including limiting the amounts of ammonia and nitrate that are allowed to flow into the Delta and its waterways.

Given the growing body of evidence demonstrating that the current discharge is having a detrimental effect on the Delta ecosystem, the required treatment upgrades must occur without delay. Allowing pollutant loading to continue to increase for another 10 years would further compound the impacts on the Delta ecosystem. We urge the State Water Resources Control Board to require implementation of interim treatment measures and a shorter compliance schedule, particularly for nitrogen removal.

Organizations, public agencies and leaders throughout the state have been working diligently towards a comprehensive solution to the overall Delta crisis. Reducing ammonia, nitrate, and pathogens in the Delta is critical to that effort, which is why it is essential that your Board uphold the permit approved by the Central Valley Regional Water Quality Control Board and require implementation of interim measures and a shortened compliance schedule to reduce nitrogen discharges.

Thank you for your consideration.

Sincerely,



William D. Phillimore
Coalition for a Sustainable Delta
cc:

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